

**Office of the Standing Chapter 13 Trustee
Krista M. Preuss**

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July 16, 2021

The Hon Sean Lane
United States Bankruptcy Judge, SDNY
300 Quarropas Street.
White Plains, NY 10601

Re: Linda M. Tirelli, Esq. Multi Case Order to Show Cause

Justo Reyes Case No. 16-22556 (SHL)
Karen Jackson Case No. 16-23514 (SHL)
Janet Berger Case No. 17-22921 (SHL)
Anastasia Cretekos Case No. 18-22239 (SHL)
Frank Occhipinti Case No. 18-22690 (SHL)
Richard Graham Watson Case No. 18-22923 (SHL)
Douglas Kramer Case No. 18-22940 (SHL)
Charmaine J. Brown Case No. 18-23036 (SHL)
Janice K. Desmond Case No. 18-23750 (SHL)
Suzanne M. Faupel Case No. 19-22007 (SHL)
Christopher Rocco Gizzo Case No. 19-22051 (SHL)
John Kolkowski Case No. 19-22172 (SHL)
Catherine R. Pelle Case No. 19-22229 (SHL)
David Daniel Akerib Case No. 19-22276 (SHL)
Sarah Frankel Case No. 19-22281 (SHL)
Malka Farkas Case No. 19-22520 (SHL)
Blossom Joyce Consingh Case No. 19-23034 (SHL)

Dear Judge Lane:

This submission is intended to respond to the letter dated July 15, 2021 by ethics counsel Ricard E Greyson, Esq., requesting an adjournment and an enlargement of time. While this office sympathizes with counsel's travel obligations, the matter at hand involves escrow funds and an investigation by the United States Trustee's office.

This office is of the opinion that the emergency hearing called for by the United States Trustee's office should go forward for the reasons set forth in the US Trustee's letter of July 15, 2021. The general purpose of the US Trustee's letter is to maintain the *status quo* in relation to the escrow accounts. It is respectfully submitted that an adjournment of the emergency hearing scheduled for July 21, 2021 may defeat that purpose. Additionally, any amendment of the Chapter 13 plans at this stage when an investigation based at least partially on the representations in filed plans (some of which have been on the docket for extended periods of time) is impending may further erode the *status quo*.

For the reasons set forth, the Chapter 13 Trustee requests that the hearing scheduled for July 21, 2021 move forward as scheduled.

Krista Preuss, Ch 13 Trustee

S/ Dennis Jose

By: Dennis Jose, Esq.,
Staff Attorney
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Via Email:

Linda Tirelli, Esq
Richard Greyson, Esq.
Andy Valez-Rivera, Esq.

MEMORANDUM ENDORSED ORDER:

The Court previously granted an extension that was requested by counsel for Ms. Tirelli. But that order was limited to granting an extension of time to submit amended Chapter 13 plans in these OSC cases as required by the Court's prior order. The Court did not intend to adjourn the hearing scheduled for July 21st at 2 p.m. in these OCS cases, which was scheduled to address the legitimate and time sensitive concerns identified in the letter submitted by the United States Trustee. Accordingly, the hearing on July 21st at 2 p.m. shall proceed as scheduled. The Court apologizes for any confusion caused by its prior orders.

So Ordered.

Dated: July 16, 2021

/s/ Sean H. Lane
United States Bankruptcy Judge